

EUSTAFOR Position⁽¹⁾ on the EU Forest Monitoring Framework Regulation

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The European State Forest Association (EUSTAFOR) considers it essential to express its views on the Commission's proposal for a Regulation on a monitoring framework for resilient European forests of 21 November 2023.

EUSTAFOR underlines that high quality, precise and timely forest data is a prerequisite for accurate planning and management of forests. This is particularly important at a time of rapidly changing climatic conditions and growing societal demands that impose new and additional challenges to forest ecosystems. Therefore, it is of primary importance to ensure balanced approaches both to the forest management practice and to how the forest information will be used for setting policy objectives.

EUSTAFOR, as a stakeholder which represents 39 State Forest Management Organizations (SFMOs) across 27 European countries, continuously supports sustainable and multi-purpose management approaches in daily forest operations and promotes research and innovation in the sector. Consequently, an EU-level action to promote application of innovative techniques, such as remote sensing, in forest monitoring, assessment and reporting as well as facilitating cooperation among the Member States in this field, is of great interest to our organization.

EUSTAFOR shares the following views regarding the Commission's proposal:

1. The New EU Forest monitoring law should have clear objectives.

Setting a high-quality and innovative forest monitoring system in the EU and supporting Member States cooperation should be the primary objective of the new EU forest monitoring regulation. The proposal fails to clearly explain its objective, which should be cost effective and innovative data collection and reporting on European forests with an aim to ensure fully informed decision making. In section 1.4.1 of the Legislative Financial Statement, three of the General Objectives refer to climate change and biodiversity. For forest managers the main objective is first and foremost to manage a balanced, resilient and multifunctional forest ecosystem in the long run, and the proposal does not reflect this enough. Furthermore, the title of the regulation may be misleading as the proposal does not provide for specific measures to enhance forest resilience.

2. The Regulation must respect the Member States' competence and build upon the principles of subsidiarity and proportionality.

EUSTAFOR welcomes an EU role in facilitating the development of innovative forest monitoring systems, both financially and technically. However, the new provisions should not overcome the role of governments in forest policy strategic planning and implementation. Instead, the new instrument should promote and facilitate the cooperation among Member States, including in promotion of the concept of National Forest Programs or similar instruments, with an aim to ensure a holistic approach to forest land use in moving towards EU 2050 climate neutrality ambition. Similarly, data ownership and management ought to be precisely determined, especially as the data collected via satellites will require verification in the field.

¹ Any statement in this document is to be considered as a reflection of the best available professional expertise and does not necessarily reflect the political commitments of individual member organizations.

3. EU-based forest monitoring should build upon well-established systems supported by the Member States and relevant stakeholders.

Forest monitoring has a long, continuous tradition in most of the EU Member States. The current forest monitoring systems are complex and specifically designed to meet the demands of the national and local forest sectors and circumstances. Factors such as governmental and organizational structures, ownership patterns, financial models and forestry traditions all come into play. This makes an EU coordinated forest monitoring system a very complex endeavor, which requires proper consultation and discussion between Member States, the Commission and forest stakeholders from along the entire value chain. The process must be inclusive and transparent from the beginning till the end.

The Data Collection Framework (art. 5) should follow internationally recognized and well-established systems such as those by Forest Europe or by FAO, as these systems already form the basis for many National Forest Inventories (NFIs) in Europe. Any deviation from this set of indicators should be decided in close cooperation between the Member States and the Commission to avoid inconsistency with existing systems.

4. Data ownership and disclosure should not be determined by inventory method and cost covering.

EUSTAFOR does recognize the added value of up-to-date forest data and imagery for planning the management operations by forest managers. However, free access to forest data requires careful consideration of data ownership and sensitivity of forest information which currently subjects to data privacy. Even though 40% of forest land use remains in public ownership, the latter does not automatically equal the public data disclosure. Therefore, EUSTAFOR opposes the proposal that the European Commission will hold ownership of all data collected with the Copernicus satellites.

The future EU forest monitoring system could potentially facilitate access to forest information for policy planning, especially on privately owned forests, whereas in the current situation third parties are paid to supply updated datasets and maps. EUSTAFOR would welcome this development.

5. Data collection framework requires careful consideration to avoid inconsistencies and misinterpretations.

There is a risk of increased complexity and duplication of data measurement and reporting if the new system does not respect existing inventory systems. Related to this, two indicators refer to providing localization instead of a measurable unit (localization of forest habitats under Natura 2000 and localization of Old-Growth Forests). Thus, reporting on these two indicators may be burdensome, especially for large forest managers and, even more importantly, would not allow for observation of trends over time.

Furthermore, the proposed Geographically Explicit Identification System for Forest Units is vague. Firstly, it is very unclear how Forest Units will be determined. Their minimum and maximum sizes, homogeneity, and parameters on which they are based are unknown. Secondly, EUSTAFOR questions the need of linking monitored data to geographical locations because this is not necessary to observe and analyze trends in forest ecosystems at EU level. It would be preferred instead that Member States can submit their data as statistics rather than a high-resolution map which could hold sensitive data.

In the impact assessment (IA), the Commission clearly states that current NFIs are designed to only monitor economic, production-related variables such as volume of growing stock, a statement that EUSTAFOR strongly disagrees with. The new forest monitoring proposal suggests using Earth Observation (EO) to monitor the state of biodiversity in the European forests. Some of the indicators that are referred to are dead wood and habitat trees, as well as management practices and old-growth forest. While certain indicators might be possible to measure using satellites, the overall quality will not be up to current standard without additional field measurements.

In Article 5 a breakdown can be found of all parameters that need to be measured. One of those is 'Tree cover disturbances'. It is important that the definition of this parameter is very clear as if abusively used it may have unavoidable consequences for forestry activities. On a spatial scale of 10m or finer, as per the proposal, even selective cutting of single trees will be visible. It is therefore crucial for SFMOs that this data will not lead to obstacles for management aimed at promoting healthy forests and sustaining a robust bioeconomy. Moreover, the new law aims to ensure the provision of complete forest data to support the improvement of forest resilience, but the parameters listed are few and focused on basic forest inventory information and will not be very helpful to understand and predict the impacts of climate change and other environmental changes on forest ecosystems. For resilient forests, all monitoring data already collected in a harmonized way at the continental scale (e.g. ICP Forests, eLTER., ICOS...) should be used.

Another often referred to benefit of the proposed system is the use of EO for monitoring forest disturbances. The IA states that optical remote sensing with sufficiently high frequency ('at least yearly, ideally monthly') and spatial resolution is of great relevance. This will not be the case for all disturbance types. For example, bark beetle is not active year-round, so monthly frequency is redundant. On another note, forestry enterprises have excellent knowledge of where the outbreaks are and how they are spreading. Monitoring this is a practice that is engrained in their day-to-day forest management and is often done with drones, which have a higher resolution and the most recent information. EO could be interesting for other disturbances, such as fires or droughts, although real-time imagery would be preferred here.

6. The new EU Forest Governance is essential in the implementation of the forest monitoring framework.

EUSTAFOR believes that the development and implementation of the new system ought to be subject to well-established forest governance at EU level, with a clear role for the Standing Forestry Committee and the Forest Stakeholder Platform. Both groups should provide a platform for benchmarking and knowledge exchange. This should maximize efficiency in the transfer to a new monitoring system and preserve local knowledge. The latter should not only ensure knowledge sharing and mutual learning, but also assist the Commission in drafting detailed provisions in the field of harmonization, standardization, and technical specification of ground-based data, as well as in developing technical rules and procedures. The Standing Forestry Committee should be clearly assigned to this role. EUSTAFOR cannot support the provisions of Article 14, which empowers the Commission to adopt delegated acts to change crucial parts of the regulation and annexes.

Conclusion

The EU forest monitoring initiative should start with building upon previous experience of the Forest Focus Regulation (No 2152/2003) and on the well-established forest inventory systems of Member States, as well as on the international forest monitoring. EUSTAFOR sees good reasons for re-establishment of an EU-level forest monitoring to ensure accurate, digitalized, consistent, comparable, timely and accessible data on the state of EU forests, provided that it is well governed by Member States and the Commission together and supported by a wide group of stakeholders of the entire value chain. Such a system must be developed with full respect to the



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ownership of information, data sensitivity and the need to satisfy societal needs for forest-related information. But most importantly, it should be done with respect for proper policy designing and objective setting by competent authorities, the aim of which should be durable, sustainably managed and multifunctional forests in Europe. EUSTAfor will be ready to support such a process with the know-how and experience of its members.